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October 16, 2020

VIA ECF

Hon. Ronnie Abrams, U.S.D.J. United States District Court Southern District of New York 40 Foley Square, Room 2203 New York, New York 10007 Application granted.

SO ORDERED.

Hon. Ronnie Abrams 10/20/2020

Re: Veerapan Subramanian v. Lupin, Inc., Civil Action No. 17-cv-5040 (RA)(KHP)

Dear Judge Abrams:

This firm represents Sellers in the above-referenced action. We write pursuant to Your Honor's Order entered September 29, 2020 (ECF Doc. No. 372) directing the parties to file more narrowly tailored versions of documents filed under seal and Your Honor's order dated October 15, 2020 directing Sellers to file an unredacted version of their objections to Judge Parker's Report and Recommendation ("Objections") (ECF Doc No. 355).

Upon further review of Sellers Objections prior to filing, one line of Sellers Objections contains information requested by Lupin to be redacted on the grounds that it contains details of Lupin's confidential business plans. Counsel for Lupin reviewed and approved redaction of this material in connection with Sellers submission of more narrowly tailored redactions of their brief in support of partial summary judgment, and the bases therefor were stated by Lupin in their letter submission to the Court filed October 2, 2020 (ECF Doc. No. 376). Accordingly, Sellers request that the Court accept for filing under seal this more narrowly redacted form of Sellers Objections in lieu of an unredacted copy as directed in the Court's October 15, 2020 Order.

The Court's consideration of this request is appreciated.

Respectfully submitted,

/s/ Martin C. Fojas

Martin C. Fojas

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